



Mountaineering Scotland

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Lesley Tosun
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Dear Ms Tosun

**ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2000
SCOPING OPINION REQUEST FOR PROPOSED SECTION 36 APPLICATION FOR
TOMCHRASKY WIND FARM**

This letter is the response by the Mountaineering Council of Scotland (MCoS), also known as Mountaineering Scotland, to the scoping for the environmental impact assessment.

Brookfield Renewable UK Ltd proposes a wind farm of up to 18 turbines of up to 145m blade-tip height on moorland north of Glen Moriston.

The proposed methodology is largely standard and therefore broadly acceptable. We comment only on those areas where we have some concerns.

Paragraph 3.6 of the scoping report is not incorrect but is misleading. Most of the proposed development site lies within a Wild Land Area and therefore paragraph 215 of Scottish Planning Policy is engaged for the whole proposal. While not totally precluding wind farm development, this is a high policy hurdle which is almost ignored in the Scoping report, receiving not a single mention in Section 4.

The proposed viewpoints show a preference for more distant hills with limited visibility of the proposed development while ignoring closer hills of the same type with full visibility. We do not regard the inclusion of Creag Meagaidh (Munro, 33km), Carn Gorm (Graham, 20km) or Ghlas Beinn (Graham, 20 km) as useful, and regard Meall Fuar-mhonaidh (Graham, 21 km) as doubtful.

We recommend that the Ben Loyne ridge (Corbett, 6 km), the Aonach Shasuinn ridge (Corbett, 5 km) and Carn a' Chaochan (Graham, 2 km) be included to give a more balanced picture of the visual impact on mountaineering assets. Proposed viewpoint 3 is mis-named.

We note the intention to use a mixture of dated and unsound evidence on tourism and recreation impacts. This is the standard approach taken in environmental statements and is deeply unsatisfactory.

The proposal to use long distance routes and core paths to proxy informal outdoor recreation is totally inappropriate. A major component of tourism and recreation in this area is hill-walking. This involves summits, not 'ways' and paths. We cannot help but wonder if the latter are proposed because they are mostly on low ground with limited visibility of the proposed development.

Paragraph 12.18 is unacceptable. If 'local' is drawn tightly then accommodation will show little impact. Most accommodation used when hill-walking in this area is in the Great Glen or Kintail. Restriction to routes and attractions is unsatisfactory for reasons already given.

The third cut-and-pasted bullet should not include reference to the Southern Upland Way.

We hope that these comments can be used to improve the EIA.

Yours sincerely

David Gibson
CEO